

Hearing Date: June 29, 2023 at 10:00am (prevailing Eastern Time)
Objection Deadline: May 23, 2023

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

..... X
:
In re: : Chapter 11
:
TV Azteca, S.A.B. de C.V., et al. : Case No. 23-10385 (LGB)
:
Alleged Debtors.¹ : (Jointly Administered)
:
..... X

**NOTICE OF HEARING ON ALLEGED DEBTORS' MOTION TO
DISMISS THE INVOLUNTARY CHAPTER 11 PETITIONS**

PLEASE TAKE NOTICE that, on April 25, 2023, the Alleged Debtors filed the *Motion to Dismiss the Involuntary Chapter 11 Petitions* (the “Motion”), which seeks entry of an order dismissing the involuntary chapter 11 petition filed against each Alleged Debtor by Plenisfer Investments SICAV – Destination, Cyrus Opportunities Master Fund II, Ltd., and Sandpiper Limited.

PLEASE TAKE FURTHER NOTICE that an in-person hearing on the Motion (the “Hearing”) will be held before the Honorable Lisa G. Beckerman, United States Bankruptcy

¹ The Alleged Debtors in these cases are TV Azteca, S.A.B. de C.V.; Alta Empresa, S.A. de C.V.; Asesoría Especializada en Aviación, S.A. de C.V.; Equipo de Futbol Mazatlán, S.A. de C.V.; Producciones Dopamina, S.A. de C.V.; Azteca Records, S.A. de C.V.; Ganador Azteca, S.A.P.I. de C.V.; Operadora Mexicana De Televisión, S.A. de C.V.; Azteca Sports Rights LLC; Producciones Azteca Digital, S.A. de C.V.; Producciones Especializadas, S.A. de C.V.; Productora De Televisión Regional de TV Azteca, S.A. de C.V.; Promotora de Fútbol Rojinegros, S.A. de C.V.; Mazatlán Promotora de Fútbol, S.A. de C.V.; Publicidad Especializada en Medios De Comunicación de TV Azteca, S.A. de C.V.; S.C.I. de México, S.A. de C.V.; Servicios Aéreos Noticiosos, S.A. de C.V.; Servicios Especializados TAZ, S.A. de C.V.; Servicios y Mantenimiento del Futuro en Televisión, S.A. de C.V.; Corporación de Asesoría Técnica y de Producción, S.A. de C.V.; Editorial Mandarina, S.A. de C.V.; Multimedia Espectáculos y Atracciones, S.A. de C.V.; Servicios Foráneos de Administración, S.A. de C.V.; Servicios Locales de Producción, S.A. de C.V.; Azteca International Corporation; Stations Group, LLC; TV Azteca Honduras, S.A. de C.V; Comercializadora de Televisión de Honduras, S.A. de C.V.; Incotel, S.A.; TVA Guatemala, S.A; Lasimex, S.A. de C.V.; TV Azteca Global, S.L.U.; Azteca Comunicaciones Perú, S.A.C.; Redes Opticas, S.A.C; Televisora del Valle de México, S.A. de C.V. The location of the Debtors’ corporate headquarters is Periférico Sur 4121, colonia Fuentes del Pedregal, alcaldía Tlalpan, C.P. 14140, Ciudad de México, México.

Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 623, 1 Bowling Green, New York, NY 10004 (the “Bankruptcy Court”) on **June 29, 2023 at 10:00 a.m. (prevailing Eastern Time)** or on such other date as may be fixed by the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE that any responses or objections (the “Objections”) to the Motion shall: (a) be in writing, (b) shall conform to the Bankruptcy Rules, the Local Bankruptcy Rules for the Southern District of New York, and all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York; (c) shall be filed with the Bankruptcy Court electronically on the docket of *TV Azteca, S.A.B. de C.V.*, et al., Case No. 23-10385 by registered users of the Bankruptcy Court’s case filing system in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) (with a hard copy delivered directly to chambers pursuant to Local Rule 9070-1) so as to be filed and received no later than **May 23, 2023**.

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served with respect to the Motion, the relief requested shall be deemed unopposed and the Bankruptcy Court may enter an order granting the relief sought without hearing.

PLEASE TAKE FURTHER NOTICE that copies of the Motion and other pleadings filed in these chapter 11 cases may be obtained by visiting the Bankruptcy Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: April 25, 2023
New York, New York

/s/ Jay Cohen
Jay Cohen
Elizabeth R. McColm
William A. Clareman
Sean A. Mitchell
Shane D. Avidan

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

1285 Avenue of the Americas
New York, New York 10019-6064
Telephone: (212) 373-3000
Facsimile: (212) 757-3990
jcohen@paulweiss.com
emccolm@paulweiss.com
wclareman@paulweiss.com
smitchell@paulweiss.com
savidan@paulweiss.com

Counsel to the Alleged Debtors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

..... X
:
In re: : Chapter 11
:
TV Azteca, S.A.B. de C.V., et al. : Case No. 23-10385 (LGB)
:
Alleged Debtors.¹ : (Jointly Administered)
:
..... X

MOTION TO DISMISS THE INVOLUNTARY CHAPTER 11 PETITIONS

The Alleged Debtors in these involuntary chapter 11 cases (collectively, these “Cases”), by and through their undersigned counsel, move this Court for: (i) entry of an order dismissing the involuntary chapter 11 petition filed against each Alleged Debtor by Plenisfer Investments SICAV – Destination, Cyrus Opportunities Master Fund II, Ltd., and Sandpiper Limited; and (ii) for such other and further relief as may be necessary or appropriate.

This Court has jurisdiction to consider this motion pursuant to 28 U.S.C. §§ 157 and 1334. Consideration of the motion is a core matter pursuant to 28 U.S.C. § 157(b)(2)(A). Venue of this motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

¹ The Alleged Debtors in these cases are TV Azteca, S.A.B. de C.V.; Alta Empresa, S.A. de C.V.; Asesoría Especializada en Aviación, S.A. de C.V.; Equipo de Futbol Mazatlán, S.A. de C.V.; Producciones Dopamina, S.A. de C.V.; Azteca Records, S.A. de C.V.; Ganador Azteca, S.A.P.I. de C.V.; Operadora Mexicana De Televisión, S.A. de C.V.; Azteca Sports Rights LLC; Producciones Azteca Digital, S.A. de C.V.; Producciones Especializadas, S.A. de C.V.; Productora De Televisión Regional de TV Azteca, S.A. de C.V.; Promotora de Fútbol Rojinegros, S.A. de C.V.; Mazatlán Promotora de Fútbol, S.A. de C.V.; Publicidad Especializada en Medios De Comunicación de TV Azteca, S.A. de C.V.; S.C.I. de México, S.A. de C.V.; Servicios Aéreos Noticiosos, S.A. de C.V.; Servicios Especializados TAZ, S.A. de C.V.; Servicios y Mantenimiento del Futuro en Televisión, S.A. de C.V.; Corporación de Asesoría Técnica y de Producción, S.A. de C.V.; Editorial Mandarina, S.A. de C.V.; Multimedia Espectáculos y Atracciones, S.A. de C.V.; Servicios Foráneos de Administración, S.A. de C.V.; Servicios Locales de Producción, S.A. de C.V.; Azteca International Corporation; Stations Group, LLC; TV Azteca Honduras, S.A. de C.V; Comercializadora de Televisión de Honduras, S.A. de C.V.; Incotel, S.A.; TVA Guatemala, S.A; Lasimex, S.A. de C.V.; TV Azteca Global, S.L.U.; Azteca Comunicaciones Perú, S.A.C.; Redes Opticas, S.A.C; Televisora del Valle de México, S.A. de C.V. The location of the Debtors’ corporate headquarters is Periférico Sur 4121, colonia Fuentes del Pedregal, alcaldía Tlalpan, C.P. 14140, Ciudad de México, México.

The motion is made pursuant to: (i) 28 U.S.C. § 157(a) and (b)(2)(A) and 28 U.S.C. § 1334; (ii) 11 U.S.C. §§ 105, 303(b)(1), 305(a)(1), and 1112(b); (iii) the doctrine of *forum non conveniens*; (iv) Rules 1011, 1017, and 1018 of the Federal Rules of Bankruptcy Procedure; (v) Rule 12(b) of the Federal Rules of Civil Procedure; (vi) to the extent made applicable therein, the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure, and the Local Bankruptcy Rules for the Southern District of New York; (vii) the Memorandum of Law in Support of the Alleged Debtors' Motion to Dismiss the Involuntary Chapter 11 Petitions; (viii) the Declarations of William A. Clareman, Rafael Rodriguez Sánchez, and Luis Manuel C. Mejan, and the exhibits filed contemporaneously herewith; (ix) the records and the files in these Cases; and (x) such other and further matters as may be presented herein.

Dated: April 25, 2023
New York, New York

Respectfully submitted,

/s/ Jay Cohen
Jay Cohen
Elizabeth R. McColm
William A. Clareman
Sean A. Mitchell
Shane D. Avidan

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**
1285 Avenue of the Americas
New York, New York 10019-6064
Telephone: (212) 373-3000
Facsimile: (212) 757-3990
jcohen@paulweiss.com
emccolm@paulweiss.com
wclareman@paulweiss.com
smitchell@paulweiss.com
savidan@paulweiss.com

Counsel to the Alleged Debtors